

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
Nashville Division**

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**PATRICK PERKINS,**

**Plaintiff,**

**v.**

**No.: 3:16-cv-00220  
Aspen/Brown**

**SPECTRACORP OF TENNESSEE, d/b/a  
FANN MECHANICAL CO., and  
RANDALL FANN,**

**Defendants.**

**JURY DEMAND**

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**DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS**

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Come now the Defendants and submit the following proposed voir dire questions:

1. Does anyone have any prior knowledge of any of the parties to this action?
2. Does anyone believe that just because a plaintiff brings a lawsuit, the plaintiff must have experienced an injury or injustice to them?
3. Does anyone believe that just because a person or company is named as a defendant, the defendant must have done something wrong or violated some law?
4. Has anyone ever been terminated from there employment?
  - a. If so, what was your experience and reason for termination?
5. Has anyone been in a supervisory role and had to terminate an employee?
  - a. If so, what was your experience?
6. Is anyone a landlord or own rental property?
  - a. If so, have you had to evict a tenant?
7. Has anyone been a tenant in a residential rental property?

- a. If so, have you been evicted?
- b. If you have been evicted, what were the circumstances of your eviction?
- 8. Has anyone had small jobs done around their home by an individual (i.e. yardwork, painting, drain fixed)?
  - a. If so, how was the person paid and what records did you keep?
  - b. Did you consider that person an employee or an independent contractor?
- 9. Has anyone performed odd jobs or small jobs for another person for compensation?
  - a. If so, how were you paid?
  - b. What documents did you keep?
  - c. Did you classify yourself as an employee or an independent contractor?
- 10. Of the people who have HVAC or construction field experience, have you ever experienced rude or crude language?
  - a. If so, what was your experience?
  - b. Did you make any complaints or feel the need to file a complaint?
- 11. Does anyone believe there are vindictive people in society?

Respectfully submitted,

/s/ Johnathon C. Hershman  
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*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been sent to the following via the District Court's electronic filing system:

Kerry E. Knox  
117 South Academy Street  
Murfreesboro, Tennessee 37130

Stephen W. Grace  
1019 16<sup>th</sup> Avenue, South  
Nashville, Tennessee 37212

On this 8<sup>th</sup> day of September, 2017.

/s/Johnathon C. Hershman  
JOHNATHON C. HERSHMAN